

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING as Owner and Operator of M/T
Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

APPLICATION FOR AWARD OF FEES AND COSTS

Claimant/Respondent, Norfolk and Portsmouth Belt Line Railroad Company (“Belt Line”) hereby files this application for the award of fees pursuant to the Court’s Order entered on August 20, 2025 (Doc No. 88) and states the following in support of this application:

Court reporter’s appearance fees and applicable costs related to Mr. Morrissey’s failure to appear for his deposition in Florida on June 24, 2025 are \$1,418.52 and the invoice reflecting this amount are attached hereto as **Exhibit 1**.

Travel expenses related to the attendance of the deposition in Florida on June 24, 2025 total \$1,116.39. An itemized expense spreadsheet including flights and hotel accommodations is attached hereto as **Exhibit 2**. Total attorney time spent in preparation, travel to Florida, attendance at deposition, and return travel was seventeen (17) hours, at the hourly rate of Four Hundred Twenty-five Dollars (\$425.00), for a total fee of \$7,225.00.

Court reporter appearance fees and applicable costs related to Mr. Morrissey’s failure to appear for his deposition in Norfolk, Virginia on September 2, 2025 are \$2,493.00 and the invoice reflecting this amount is attached hereto as **Exhibit 3**. Total attorney time spent in preparation and attendance at deposition was five and a half (5.5) hours, at the hourly rate of Four Hundred Dollars (\$400.00), for a total fee of \$2,200.00.

Dated: September 19, 2025.

NORFOLK AND PORTSMOUTH BELT
LINE RAILROAD COMPANY

By: /s/ James L. Chapman, IV
James L. Chapman, IV, VSB No. 21983
W. Ryan Snow, VSB No. 47423
Mackenzie R. Pensyl, VSB No. 100012
CRENSHAW, WARE & MARTIN, P.L.C.
150 W. Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com
wrsnow@cwm-law.com
mpensyl@cmw-law.com
*Counsel for Norfolk and Portsmouth Belt
Line Railroad Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of September 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all registered counsel of record, and mailed to:

James Morrissey
4723 Baywood Drive
Lynnhaven, FL 32444

By: /s/ Mackenzie R. Pensyl
Mackenzie R. Pensyl, VSB No. 100012
CRENSHAW, WARE & MARTIN, P.L.C.
150 W. Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
mpensyl@cwm-law.com
*Counsel for Norfolk and Portsmouth Belt
Line Railroad Company*